

Hanford Federal Facility Agreement and Consent Order Recovery Plan Responsiveness Summary

This responsiveness summary is in response to written comments received by the Washington State Department of Ecology (Ecology) and the U.S. Department of Energy (USDOE) on the recovery plan related to the Waste Treatment Plant under the Tri-Party Agreement.

<u>Number</u>	<u>Comment submitted by:</u>	<u>Change Form:</u>	<u>Comment</u>	<u>Agency Response</u>
1	Douglas Huston	None	<p>The list of high level bases and assumptions in Appendix 1 is incomplete. For example:</p> <p>a. Assumption 6 contains an implicit assumption that regulatory actions will also be favorable to the project. This is a significant assumption and needs to be explicitly called out. Specifically, the baseline assumes that the NRC will issue a “waste incidental to processing” determination for tank residual waste. The Natural Resources Defense Council, et.al. lawsuit over DOE Order 435.1 makes this outcome less certain.</p> <p>b. Assumption 9 contains an implicit assumption that there will be no labor unrest during the construction of the Waste Treatment Plant. This is a significant assumption for a project of this magnitude and duration and should be explicitly called out.</p> <p>c. Assumption 10 on melter performance is</p>	<p>a. With respect to comments on Assumption 6, the statement does not apply to DOE Order 435.1 applications. It refers to hazardous waste facility and air permitting issues. DOE and Ecology each recognize that environmental compliance issues associated with the tank waste treatment complex will continue as a core set of requirements that may affect work schedules. DOE’s Recovery Plan and associated TPA changes do not modify requirements regarding tank waste retrieval or residual wastes that may be left in SST’s following retrieval. Those requirements are found at TPA milestone series M-45-00.</p> <p>b. Assumption 9, your comment is noted. The statement does not reflect labor unrest, although we agree that it could be an issue. The assumption refers to the number of people needed and equipment availability to maintain the schedule.</p> <p>c. Assumption 10, your comment is noted. The</p>

Hanford Federal Facility Agreement and Consent Order Recovery Plan Responsiveness Summary

			<p>unrealistic given the first time nature of the scale of this operation, and there is o evidence or report anywhere that we could find that could substantiate this assumption.</p> <p>d. There are no assumptions concerning double shell tank integrity or space.</p>	<p>explanation of this assumption was given on page 11 of the recovery plan text.</p> <p>d. Your comment has been considered, Double Shell Tank Integrity is outside the scope of the recovery plan.</p>
2	Douglas Huston	None	<p>The attached charts had several deficiencies:</p> <p>a. The charts define a red path as less than 60 days duration, and an orange path as less than 6 months duration, yet many of these paths on the charts extend for longer than the defined durations. This apparent inconsistency needs to be explained.</p> <p>b. No double shell tank space optimization tasks are included.</p>	<p>On the schedule red lines portray the critical path through the schedule defined as a schedule path with less then 60 days of total float. Orange lines portray the paths of Concern through the schedule; defined as the paths with less then 6 months of total float. The lines associated with those colors can extend for longer then the timeframe indicating that the activities are connected and therefore all conform to the conditions.</p> <p>b. Double Shell Tanks are outside the scope of the recovery plan.</p>
3	D. M. Johnson P.O. Box 888 Benton City, WA 99320 509/588-6201 Former DOE-Rockwell & Westinghouse employee; 19 ½ years at Hanford.	None		We appreciate your interest in the recovery plan.
4	John W. Kiefer	None	I recently read a press release put out by Eurotech Ltd in which they describe a process using a form of EKOR TM that when mixed with nuclear waste causes it to harden into a porcelain mass. Are you	In response to specific needs, DOE and its contractors issue requests for proposals for competitive bid. The release of these RFPs are announced in a variety if ways, including publishing announcements in newspapers and the

Hanford Federal Facility Agreement and Consent Order Recovery Plan Responsiveness Summary

			familiar with that process and can it become a more immediate solution to leakage problem[s]?	<p>Commerce Business Daily, listings on websites such as FedBizOpps.gov (http://www.fedbizopps.gov) , the Department of Energy's e-Center (http://e-center.doe.gov/doebiz.nsf), which provide information on business opportunities across the Department of Energy complex, and the Hanford Internet Home Page (http://www.hanford.gov/rl/opportunities.asp and http://www.hanford.gov/opportunities.html).</p> <p>Unsolicited proposals may be submitted for DOE consideration. A guide for the submission of unsolicited proposals is available on the DOE website at http://www1.pr.doe.gov/gdtoc.html. The Unsolicited Proposal Program is managed by the National Energy Technology Laboratory - Pittsburgh Office. All unsolicited proposals should be forwarded to John N. Augustine, who will serve as the single point of contact for all unsolicited proposals. Please direct all correspondence and/or unsolicited proposals to Mr. Augustine, at the below address:</p> <p style="padding-left: 40px;">John N. Augustine, Mail Stop 921-107 Unsolicited Propopsal Coordinator U.S. Department of Energy National Energy Technology Laboratory 626 Cochrans Mill Road P.O. Box 10940 Pittsburgh, PA 15236-0940</p> <p style="padding-left: 40px;">Telephone No.: 412-386-4524 Facsimile No.: 412-386-6137</p> <p style="padding-left: 40px;">e-mail: john.augustine@netl.doe.gov</p>
5	Kristine Brotherton 2147 W. Willow	None		Thanks you for your interest in the recovery plan and support for this project.

Hanford Federal Facility Agreement and Consent Order Recovery Plan Responsiveness Summary

	Moses Lake, WA 98837 509/1093			
6	Paige Knight Hanford Watch	None	<p>It is of deepest concern to our organization that we get a credible, workable tank waste treatment facility running successfully at Hanford. ... We commend the agencies for recovering from the BNFL debacle faster than imagined but are concerned over any further delays. [and] We are concerned about the “fast track” approach adopted in the recovery plan, thus urge tight regulatory agency oversight by Ecology, Washington Department of Health when applicable & EPA.</p> <p>We expect to be informed at the outset of any difficulties and further delays.</p> <p>We understand Bechtel is pushing for an early start of construction to make up time and acquire fee. We urge that safety on all or any level(s) is not compromised.</p> <p>There is some dismay within our organization about there not being public hearings on these changes to the TPA.</p>	<p>Ecology and DOE recognize the challenges inherent in avoiding further delay, while assuring the acquisition and operation of a robust tank waste treatment complex that meets all environmental requirements. Ecology has developed an in depth team of oversight staff assigned to tank waste treatment and will continue to keep a close eye on associated issues. Both DOE and Ecology are committed to close coordination with all other involved agencies including the WA Dept. of Health and EPA Region 10. While recognizing the challenges we face, we remain confident that through a team approach, the parties can deliver a treatment complex that does the job, and that the Pacific Northwest can be proud of..</p> <p>Ecology and DOE are both committed to fully open communication including the timely identification and open discussion of issues.</p> <p>DOE and Ecology both agree it is unacceptable to compromise safety for the sake of schedule.</p> <p>The need for public meetings on Tri-Party Agreement issues is always one that requires judgment, and an assessment of whether or not a meeting or meetings should be scheduled.. In this case, the agencies based their decision on numerous briefings and discussions that had taken place with Hanford stakeholders and the Hanford Advisory Board. Based on these discussions it was apparent that the overall sentiment was supportive of the</p>

**Hanford Federal Facility Agreement and Consent Order Recovery Plan
Responsiveness Summary**

				parties proposed changes. We received virtually no calls for public meetings. The agencies consequently placed the recovery plan and associated TPA changes into the formal public comment period process as prescribed in the TPA. Public hearings as defined by the TPA are required for draft permit modifications in accordance with Washington Administrative Code 173-303-840 and would not be applicable in the case of the recovery plan.
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